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3M Company :: 3M

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Abstract

3M is submitting this notice to supplement its previous submissions on sulfonyl-based and carboxylate-based fluorochemicals and more specifically, our September 5, 2006 submission on water samples taken from

groundwater wells and from the water distribution system at the 3M plant site in Cordova, Illinois and our March 10, 2010 submission on water samples taken from commercial wells adjacent to the 3M Cordova facility.

The data contained in previous submissions and in this correspondence have been generated as part of an on-going site-related environmental assessment of fluorochemicals that 3M is performing for its 3M Cordova, Illinois manufacturing facility. As part of this effort, which is being done with the involvement and approval of the Illinois Environmental Protection Agency, 3M has recently received the enclosed well water data taken from various private residential properties in the vicinity of the 3M plant. Off-site data are limited to seven private wells, referred to by five-digit identification numbers as listed in the enclosures to this submittal.

Enclosed please find a map depicting the sampling locations, a data summary table, and a final analytical report (Interim Report #3-Analysis of 3M Cordova Groundwater Samples: July 2011; Analysis of Perfluorobutanoic Acid (PFBA), Perfluorooctanoic Acid (PFOA), Perfluorobutanesulfonate (PFBS), Perfluorohexanesulfonate (PFHS), and Perfluorooctanesulfonate (PFOS) in Groundwater Using LC/MS/MS for the "3M Fluorochemical (FC) Assessment Work Plan for the 3M Cordova, IL Facility).

With the exception of one low measurement of PF13S in one well and a similar low reading for PFOS in another well, the results for PFOA, PFOS, PFHS and PFBS were all less than the limit of quantitation (<0.025 ng/ml). PFBA results ranged from 0.0673 to 3.41 ng/mL.

For context, it should be noted that U.S. EPA has established Provisional Health Advisories (i.e. guidance levels pertaining to drinking water) of 0.4 and 0.2 ng/mL for PFOA and PFOS, respectively. We are not aware of any EPA plans to establish a PHA for PFBA. Further perspective is provided by recently issued site specific cleanup objectives as derived by the Illinois EPA. As established for the 3M Cordova site, these groundwater objectives are 0.4, 0.2 and 20 ng/mL for PFOA, PFOS and PFBA, respectively. Another comparator for PFBA comes from Minnesota where the Department of Health has set a Health Risk Limit (HRL) value for drinking water of 7 ng/mL for PFBA. In conclusion, all results for all the wells sampled are well below known drinking water guidance values or standards. Inherent in these criteria are assumptions and safety factors to ensure safe levels in drinking water for a lifetime of consumption.

While 3M does not believe that any of these data taken alone or cumulatively meet the "substantial risk" reporting threshold as defined by the EPA, we nevertheless recognize the ongoing work of the U.S. EPA to assess fluorochemical exposure pathways. Therefore, we are placing these results in the 8(e) docket as a supplement to previous submissions.

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